AltaSteel Ltd.
P.O. Box 2348
Edmonton, Alberta
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1-800-661-9431

Gloria Blue, Executive Secretary,
Trade Policy Staff Committee,
Office of the USTR, 600 17th Street, NW
Washington, DC 20508
United States of America.

Dear Sir:

Please consider this request from AltaSteel Ltd. to exclude "Grinding Rod" from import relief under section 203.

AltaSteel Ltd. located in Edmonton, Alberta, Canada is scrap based, mini mill steelmaking operation complete with melting, casting and rolling mill facilities. Established in 1955, the company operated under the name of Premier Steel until the company was purchased by Stelco Inc. in 1962. AltaSteel is distinguished as having the first operational continuous caster for carbon steel billets in North America, and in 2001 the AltaSteel bar mill has been expanded to include new inline mill stands and a heat treat facility. The heat treat facility will be commissioned in early 2002.

AltaSteel has approximately 375 full time employees and a steelmaking capacity of 325,000 tons per year. **AltaSteel is North America's only Heat Treated Grinding Rod producer** supplying approximately 95% of the Grinding Rod consumed coast to coast. Grinding Rod is used by the mining industry to crush and grind ore. There is no cost effective substitute for grinding rod.

In 2002 AltaSteel anticipates shipping 33,000 tons of Grinding Rod valued at approximately $US13,650,000 into the United States. Some of AltaSteel's largest grinding rod customers include: Inland Steel Mining Company, located Virginia, MN United States Steel – Minnesota Ore Operations, located in Mount Iron, MN, Kennecott Utah Copper Corporation, located in Magna, UT, Evtac Mining, located in Eveleth, MN and Cleveland Cliffs (Northshore Mine, Silver Springs, MN). In total approximately 20 Customers in the USA purchase Grinding Rod. These customers cannot purchase this product anywhere else in North America.

AltaSteel produces two different "Grinding Rod" products for the North American mining industry:

1.) High Carbon
    i. ASTM A29 1090 Modified to ASTM A 576 Supplementary Requirements S14, S18

HTS# 7214.99.0045

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2.) Heat Treated Grinding Rod

i. AltaSteel HTR50 produced with a proprietary process to specific hardenability and hardness incorporating the supplementary requirements S6 and S11 of ASTM A322.

HTS#7228.30.8050

ii. AltaSteel HTR60 produced with a proprietary process to specific hardenability and hardness incorporating the supplementary requirements S6, S8, and S11 of ASTM A322.

HTS#7228.30.8050

AltaSteel Grinding Rods are supplied in diameters of 3.000", 3.500", 4.000" and lengths up to 20' in length. Grinding Rod is hot rolled from an 8" X 8" billet to ensure adequate reduction ratios and to produce a product with high levels of internal quality.

AltaSteel Heat-Treated Grinding Rod (grades HTR50 and HTR60) are produced as hot-rolled, alloy rounds. Specific parameters are used in the hot rolling of Heat Treated Grinding Rod in order to achieve desired final properties. After hot rolling, Heat-Treated Grinding Rod are subjected to a unique and proprietary heat treatment process designed to achieve exceptional wear rates while surviving harsh grinding environments.

US Patent Numbers

AltaSteel produces heat-treated grinding rods to the following US patent numbers:

1.) 5,902,423 - Heat Treatment of Grinding Rod (HTR50)
2.) 5,972,135 – Stress Relieved Grinding Rod Having Hard Outer Shell (HTR60)
3.) 6,074,765 - Grinding Rod Chemistry and Method of Heat Treatment

We appreciate the opportunity to request this exclusion and if there is any further information you require please do not hesitate to call.

Adam Brown
Senior Sales Representative
1-780-468-7318
November 8th, 2001